

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
LYNCHBURG DIVISION**

**SCHRADER-BRIDGEPORT  
INTERNATIONAL, INC.,**

**Plaintiff,**

**and**

**SCHRADER ELECTRONICS, INC.,**

**Plaintiff,**

**VS.**

**CONTINENTAL AUTOMOTIVE  
SYSTEMS US, INC.,**

**Defendant.**

**Civil Action No. 6:11-cv-00014-NKM-RSB**

**Hon. Judge Moon**

**Hon. Mag. Judge Ballou**

## **SCHRADER'S ANSWER TO CONTINENTAL'S COUNTERCLAIMS**

Plaintiffs, SCHRADER-BRIDGEPORT INTERNATIONAL, INC. (“SCHRADER-BRIDGEPORT”) and SCHRADER ELECTRONICS, INC. (“SCHRADER ELECTRONICS”) (collectively, “SCHRADER”) answer as follows:

## I. NATURE OF THE ACTION

34. SCHRADER admits that CONTINENTAL alleges in its Counterclaims that U.S. Patent No. 7,518,495 (“the ‘495 Patent”) is invalid and not infringed. The allegations of this paragraph 34 of the Continental Counterclaims constitute arguments or conclusions of law that SCHRADER is not required to admit or deny. To the extent a response is necessary, the allegation is denied.

**II. THE PARTIES**

35. SCHRADER is without sufficient knowledge or information to form a belief as to the truth of the allegations in this paragraph of the Counterclaims and therefore denies same.

36. Admitted.

37. Admitted.

**III. JURISDICTION AND VENUE**

38. The allegations of this paragraph 38 of the Counterclaims constitute arguments or conclusions of law that SCHRADER is not required to admit or deny. To the extent a response is necessary, the allegation is denied.

39. The allegations of this paragraph 39 of the Counterclaims constitute arguments or conclusions of law that SCHRADER is not required to admit or deny. To the extent a response is necessary, the allegation is denied.

40. Admitted.

41. Admitted.

**IV. FIRST COUNTERCLAIM – NON-INFRINGEMENT**

42. SCHRADER reasserts and incorporates by reference the answers of Paragraphs 34-41 as if fully set forth herein.

43. The allegations of this paragraph 43 of the Counterclaims constitute arguments or conclusions of law that SCHRADER is not required to admit or deny. To the extent a response is necessary, the allegation is denied.

44. Denied.

**V. SECOND COUNTERCLAIM - INVALIDITY**

45. SCHRADER reasserts and incorporates by reference the answers of Paragraphs 42-44 as if fully set forth herein.

46. The allegations of this paragraph 46 of the Counterclaims constitute arguments or conclusions of law that SCHRADER is not required to admit or deny. To the extent a response is necessary, the allegation is denied.

47. Denied.

**PRAYER FOR JUDGMENT AND RELIEF**

WHEREFORE, SCHRADER-BRIDGEPORT and SCHRADER ELECTRONICS respectfully request judgment and relief as follows:

- (a) Declaring that CONTINENTAL is entitled to no relief;
- (b) Declaring that CONTINENTAL has directly infringed, contributorily infringed, and/or actively induced infringement of one or more claims of the '495 Patent;
- (c) Declaring that CONTINENTAL and those in privity with CONTINENTAL be preliminarily and permanently enjoined from infringing the '495 Patent through the manufacture, use, import, offer for sale, and/or sale of the CONTINENTAL REDI-Sensor or equivalents thereof;
- (d) Granting an award of damages adequate to compensate SCHRADER-BRIDGEPORT and SCHRADER ELECTRONICS for infringement of the '495 Patent, but in no event less than a reasonable royalty, together with prejudgment interest, costs and disbursements as fixed by the Court;
- (e) Granting an award increasing damages up to three times the amount found or assessed for infringement of the '495 Patent by CONTINENTAL due to the willful and deliberate nature of the infringement;

- (f) Declaring a determination that this is an exceptional case and an assessment of reasonable attorneys' fees;
- (g) Granting an award of pre- and post-judgment interest as permitted; and
- (h) Granting and declaring such other and further relief as the Court deems equitable and just.

**DEMAND FOR JURY TRIAL**

Plaintiffs-Counterclaim Defendants demand a trial by jury on all issues.

Dated: November 4, 2011

SCHRADER-BRIDGEPORT INTERNATIONAL, INC.  
and  
SCHRADER ELECTRONICS, INC.

By its Attorneys,

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**CERTIFICATE OF SERVICE**

The undersigned certifies that on this the 4th day of November, 2011, the foregoing document was filed electronically using the CM/ECF system, which will send notification via the Court's electronic filing system to all counsel of record, to include:

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